

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

ROGER LESH

Complainant,

v.

**THE CLEVELAND ELECTRIC
ILLUMINATING COMPANY,**

Respondent.

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Case No. 18-1519-EL-CSS

**DIRECT TESTIMONY OF MARILYN COTTRILL ON BEHALF OF
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY**

INTRODUCTION

Q. PLEASE INTRODUCE YOURSELF.

A. My name is Marilyn Cottrill. I am employed by FirstEnergy Service Company as a customer service compliance specialist. FirstEnergy Service Company provides corporate support, including customer service, to FirstEnergy Corp.'s regulated public utility subsidiaries. In Ohio, these subsidiaries are Ohio Edison Company, The Cleveland Electric Illuminating Company ("CEI"), and The Toledo Edison Company.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE.

A. I have worked at either FirstEnergy Service Company or Allegheny Power Company ("Allegheny Power") in a customer service capacity for the last 23 years. I have held my current position since 2011, although after the merger the title was changed from Business Analyst to Customer Services Compliance Specialist.

Q. WHAT ARE YOUR CURRENT JOB RESPONSIBILITIES?

A. My job responsibilities include reviewing and responding to complaints made by customers of FirstEnergy Corp.'s regulated public utility subsidiaries to the Public Utilities Commission of Ohio ("Commission"), which process includes investigating facts and gathering information from subject matter experts. I also have responsibility for reviewing and responding to customer complaints in Pennsylvania. Among other customer service-related duties, I also provide training to new hires and to my peers within FirstEnergy regarding various state compliance requirements.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE COMMISSION?

A. No, I have not.

1 **Q. ARE YOU FAMILIAR WITH THE FACTS OF THIS CASE?**

2 A. Yes, I am.

3 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THE PRESENT CASE?**

4 A. My testimony addresses several aspects of the Complaint pertaining to the electric service
5 provided by CEI to Roger Lesh (“Mr. Lesh”) at 7712 Hillside Rd. Independence, OH 44131
6 (the “Residence”).

7 **Q. WHAT DID YOU DO TO PREPARE FOR YOUR TESTIMONY IN THIS**
8 **PROCEEDING?**

9 A. I reviewed the Complaint submitted by Mr. Lesh, as well as business records related to this
10 case maintained and preserved within FirstEnergy’s SAP System. These records, all of
11 which were kept in the course of regularly conducted business activity, include customer
12 contact notes and account summary, and CEI’s Commission-approved tariff. It is the
13 regular practice of FirstEnergy and CEI to make and preserve these business records, and
14 I rely upon such documents in accordance with my duties at CEI.

15 **RESPONSE TO OUTREACH FROM MR. LESH**

16 **Q. WHEN DID MR. LESH FIRST CONTACT CEI REGARDING THE**
17 **TRANSFORMER SERVICING HIS RESIDENCE?**

18 A. CEI’s records indicate that Mr. Lesh first called CEI on June 28, 2017 requesting to speak
19 with a supervisor regarding the transformer servicing his Residence. Following that call, a
20 CEI technician entered a work request to replace the transformer with a larger model. The
21 work request does not indicate any defects with the then-existing transformer, and the work
22 request was not marked urgent. Those facts suggest to me that the replacement was offered
23 as a courtesy due to the customer’s concerns.

1 **Q. DID CEI COMMIT TO REPLACING THE TRANSFORMER BY A DATE**
2 **CERTAIN?**

3 A. No. Again, CEI's records indicate that the CEI crew did not note any defects with the
4 transformer and offered to replace the transformer as a courtesy.

5 **Q. DID MR. LESH CONTACT CEI ABOUT THE TRANSFORMER AGAIN AFTER**
6 **THAT?**

7 A. CEI's records show that Mr. Lesh called CEI on or around June 28, 2017 requesting a
8 status update on the transformer upgrade.

9 **Q. DID MR. LESH CONTACT CEI AGAIN AFTER THAT?**

10 A. Yes. On August 6, 2018, CEI received a trouble call from Mr. Lesh, who reported that trees
11 on his property needed to be trimmed. CEI's Forestry Department then scheduled for the
12 tree trimming to take place no later than September 7, 2018.

13 **Q. DID MR. LESH CONTACT CEI AGAIN?**

14 A. Yes. CEI's records show that on the evening of August 21, 2018, a storm occurred in the
15 vicinity of Mr. Lesh's Residence, causing a sudden and unforeseen equipment failure and
16 power outage at the Residence. Specifically, the storm caused the top of the transformer
17 pole servicing the Residence to burn. The documents attached to my Testimony as Exhibit
18 A provide a record of the storm. Mr. Lesh called CEI regarding his power outage at
19 approximately 6:00am on August 22, 2018; however, CEI was already aware of the outage
20 and was taking steps to restore power.

21 **Q. HAS CEI RESPONDED TO TROUBLE CALLS LIKE THIS BEFORE?**

22 A. Yes, CEI's crews are trained to handle a variety of service-related issues, including storm
23 response and issues with physical damage to CEI-owned equipment.

1 **Q. DID CEI RESPOND TO COMPLAINANT’S TROUBLE CALL?**

2 A. Yes.

3 **Q. HOW DID CEI RESPOND TO COMPLAINANT’S TROUBLE CALL?**

4 A. In response to Mr. Lesh’s trouble call, a Work Order was created and a CEI troubleman,
5 followed by a repair crew was dispatched to the Residence.

6 **Q. DID THE BURNED TRANSFORMER POLE CAUSE THE SERVICE**
7 **INTERRUPTION THAT COMPLAINANT EXPERIENCED ON AUGUST 21 AND**
8 **22, 2018?**

9 A. I cannot say that for certain, but that appears to be the case.

10 **Q. DOES CEI KNOW FOR CERTAIN WHETHER A POWER SURGE OCCURRED**
11 **AT THE RESIDENCE ON AUGUST 21 OR 22, 2018?**

12 A. No.

13 **Q. IS IT POSSIBLE THAT COMPLAINANT EXPERIENCED A POWER SURGE AT**
14 **THE RESIDENCE?**

15 A. Yes, it is possible. However, it is also possible that some other issue, including an issue
16 within the customer’s Residence caused the problems that Complainant has complained of.
17 CEI’s investigations are limited to CEI-owned electric facilities. Customers are responsible
18 for identifying, repairing and replacing their own defective equipment, as well as
19 deficiencies in their internal electrical facilities, such as wiring and connections. CEI does
20 not take responsibility for investigation, repairs or maintenance of wiring, appliances or
21 other equipment in a customer’s property after the CEI meter.

1 **Q. DID THE SERVICE INTERRUPTION CAUSE THE DAMAGE TO**
2 **COMPLAINANT'S APPLIANCES THAT COMPLAINANT ALLEGES IN THE**
3 **COMPLAINT?**

4 A. I do not know. Again, CEI's investigations are limited to CEI-owned electric facilities. CEI
5 does not take responsibility for investigation, repairs or maintenance of wiring, appliances
6 or other equipment in a customer's property after the CEI meter.

7 **Q. DID COMPLAINANT FILE A CLAIM WITH CEI?**

8 A. Yes. Mr. Lesh filed a Claim for the appliances he alleges were damaged during the service
9 interruption on August 21 and 22, 2018.

10 **Q. DID CEI RESPOND TO COMPLAINANT'S CLAIM?**

11 A. Yes. CEI records indicate that the CEI Claims Department denied Mr. Lesh's Claim
12 because the cause of Mr. Lesh's service interruption was a sudden and unforeseen
13 equipment failure.

14 **CONCLUSION**

15 **Q. IN YOUR OPINION, WAS THE FAILURE OF THE TRANSFORMER SERVING**
16 **THE RESIDENCE ON AUGUST 21 OR 22, 2018 WITHIN CEI'S CONTROL?**

17 A. No. CEI's records indicate that the failure of the transformer was a sudden and unforeseen
18 equipment failure as a result of a storm.

19 **Q. IN YOUR OPINION, DID CEI ACT REASONABLY IN RESPONDING TO MR.**
20 **LESH'S TROUBLE CALLS?**

21 A. Yes. CEI responded to each of Complainant's calls and appropriately inspected the
22 transformer and vegetation and performed all maintenance it deemed necessary in the
23 professional judgment of its employees. When the transformer failed, CEI promptly

1 reported to the Residence to make all necessary repairs and replacements. CEI acted
2 reasonably under the circumstances.

3 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

4 A. Yes; however, I reserve my right to supplement my testimony.

CERTIFICATE OF SERVICE

On July 2, 2021, the foregoing document was filed on the Public Utilities Commission of Ohio's Docketing Information System. The PUCO's e-filing system will electronically serve notice of the filing of this document on all parties of record in this proceeding. A service copy has been sent by certified U.S. Mail on this 2nd day of July 2021 to the Complainant at the following address:

Roger Lesh
7712 Hillside Road
Independence, Ohio 44131

/s/ Kristen M. Fling
Kristen M. Fling
*Attorney for The Cleveland Electric
Illuminating Company*

EXHIBIT A

Change Service Order - Post Payment 15859081: Central Header

Order: SM 15859081 CE Major Stm Distribution Line 8/21/18

Sys.Status REL GMP5 NMAT PRC SEIC NBIL TSKS ✓

HeaderData Operations Components Costs Partner Objects Additional Data Location Planning Control Enhancement

User Defined Data

Event	
Dispatch Project	
Proj. Definition	CE-001312
S1 Element	CE-001312-DO-MSTM
Notification Work Type	
Circuit	
Circuit Voltage	
Approver	

Assignment

Power Plant Data

Work Type	#DST
Capital - Install Percentage	33
Capital - Removal Percentage	35
Operations Percentage	0
Maintenance Percentage	32

\$ Power UE

FERC

Reg. Indicator	EDPM	Energy Delivery PM
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in

Case No(s). 18-1519-EL-CSS

Summary: Testimony DIRECT TESTIMONY OF MARILYN COTTRILL ON BEHALF OF THE CLEVELAND ELECTRIC ILLUMINATING COMPANY electronically filed by Ms. Kristen M Fling on behalf of The Cleveland Electric Illuminating Company